

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

\$447.00 IN UNITED STATES CURRENCY; \$9,474.00 IN UNITED STATES CURRENCY; \$250.00 IN UNITED STATES CURRENCY; \$400.00 IN UNITED STATES CURRENCY; \$3,016.15 IN FUNDS SEIZED FROM CAPITAL ONE BANK ACCOUNT NUMBER XXXXXX9229, HELD IN THE NAME OF WAYNE J. HAWKINS; \$10,337.39 IN FUNDS SEIZED FROM SYNOVUS BANK ACCOUNT NUMBER XXX3501, HELD IN THE NAME OF CATHERINE V. HAWKINS AND WAYNE J. HAWKINS; \$29,283.89 IN FUNDS SEIZED FROM SYNOVUS BANK ACCOUNT NUMBER XXX9993, HELD IN THE NAME OF CATHERINE V. HAWKINS AND WAYNE J. HAWKINS; \$92,192.01 IN FUNDS SEIZED FROM REGIONS BANK ACCOUNT NUMBER XXXXX7651, HELD IN THE NAME OF HAWK INNOVATIVE TECH LLC; \$101,304.41 IN FUNDS SEIZED FROM GEORGIA'S OWN CREDIT UNION ACCOUNT NUMBER XXXX4037, HELD IN THE

CIVIL ACTION NO.:
3:21-CV-00122-TCB

NAME OF CATHERINE V. HAWKINS
AND WAYNE J. HAWKINS; \$48,177.33
IN FUNDS SEIZED FROM GEORGIA'S
OWN CREDIT UNION ACCOUNT
NUMBER XXXX4135, HELD IN THE
NAME OF CATHERINE V. HAWKINS
AND WAYNE J. HAWKINS; AND
VARIOUS PRECIOUS METALS, BARS
AND COINS DESCRIBED IN
ATTACHMENT A,

DEFENDANTS.

**UNITED STATES OF AMERICA'S MOTION TO SEAL EX PARTE
DECLARATION**

Comes now the United States of America, by and through counsel, Ryan K. Buchanan, United States Attorney, and Cynthia B. Smith, Assistant United States Attorney, for the Northern District of Georgia, and respectfully requests that the Ex Parte Declaration of James Nash, Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), which is being submitted in support of the United States' Response in Opposition to the motion to lift stay in above-referenced matter be sealed along with this Motion to Seal and any Order issued thereon for the following reasons.

Since approximately March 19, 2020, the ATF has been involved in the criminal investigation of Wayne Hawkins, Catherine Hawkins, and Hawk

Innovative Tech, LLC for manufacturing and selling “solvent traps” that are designed to be and function as firearm silencers. Publicly disclosing the information which is contained in the Declaration could compromise an on-going investigation.

WHEREFORE, the United States of America respectfully moves this Court to order sealed the Declaration in the above-numbered matter, as well as this Motion and any associated Order.

Submitted this 16th day of May 2022.

Respectfully submitted,

RYAN K. BUCHANAN
United States Attorney

/s/ CYNTHIA B. SMITH
CYNTHIA B. SMITH
Assistant United States Attorney
Georgia Bar No. 655473
600 U.S. Courthouse
75 Ted Turner Drive SW
Atlanta, GA 30303
Telephone: (404) 581-6000
Cynthia.Smith2@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

\$447.00 IN UNITED STATES CURRENCY; \$9,474.00 IN UNITED STATES CURRENCY; \$250.00 IN UNITED STATES CURRENCY; \$400.00 IN UNITED STATES CURRENCY; \$3,016.15 IN FUNDS SEIZED FROM CAPITAL ONE BANK ACCOUNT NUMBER XXXXXX9229, HELD IN THE NAME OF WAYNE J. HAWKINS; \$10,337.39 IN FUNDS SEIZED FROM SYNOVUS BANK ACCOUNT NUMBER XXX3501, HELD IN THE NAME OF CATHERINE V. HAWKINS AND WAYNE J. HAWKINS; \$29,283.89 IN FUNDS SEIZED FROM SYNOVUS BANK ACCOUNT NUMBER XXX9993, HELD IN THE NAME OF CATHERINE V. HAWKINS AND WAYNE J. HAWKINS; \$92,192.01 IN FUNDS SEIZED FROM REGIONS BANK ACCOUNT NUMBER XXXXX7651, HELD IN THE NAME OF HAWK INNOVATIVE TECH LLC; \$101,304.41 IN FUNDS SEIZED FROM GEORGIA'S OWN CREDIT UNION ACCOUNT NUMBER XXXX4037, HELD IN THE

CIVIL ACTION NO.:
3:21-CV-00122-TCB

NAME OF CATHERINE V. HAWKINS
AND WAYNE J. HAWKINS; \$48,177.33
IN FUNDS SEIZED FROM GEORGIA'S
OWN CREDIT UNION ACCOUNT
NUMBER XXXX4135, HELD IN THE
NAME OF CATHERINE V. HAWKINS
AND WAYNE J. HAWKINS; AND
VARIOUS PRECIOUS METALS, BARS
AND COINS DESCRIBED IN
ATTACHMENT A,

DEFENDANTS.

ORDER TO SEAL EX PARTE DECLARATION

Having read and considered the government's Motion to Seal, for good cause shown,

It is hereby ORDERED that the Ex Parte Declaration of James Nash, Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, which is being submitted in support of the United States' Response in Opposition to the Motion to Lift Stay, along with this Motion to Seal and Order, are sealed.

SO ORDERED this _____ day of _____, 2022.

THE HONORABLE TIMOTHY C. BATTEN, SR.
UNITED STATES DISTRICT JUDGE

Presented by:

s/Cynthia B. Smith

Cynthia B. Smith

ASSISTANT UNITED STATES ATTORNEY